

Response to Comment
General Permit For Stormwater Discharges Associated With Industrial Activities

This is Ecology's response to the comments received on the proposed modifications to the general permit for stormwater discharges associated with industrial activities. The comments have been summarized, grouped by section of the permit and identified by number. At the end of this document, a list of commenters is attached. The full text of the comment letters, transcripts of the public hearings and a redline/strikeout version of the permit are available on Ecology's web site at www.ecy.wa.gov/programs/wq/stormwater/industrial/permit_rewrite/08_2002_permit.html.

| Commentators: | Section | Comment | Ecology Response |
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| Rick Smith 1 Johnson 1 | | The permit is improved over previous versions | Ecology appreciates the input. |
| Rick Smith 2 Johnson 3 Kenefick 19 Mathias 1 | | <p>The commentators are concerned about parts of the permit not modified. Specific areas include:</p> <ul style="list-style-type: none"> • Condition S9.B.3.c • Lack of numeric effluent limits • Ecology's ability to implement the flexibility in the permit • BOD and turbidity Benchmark values may not be appropriate for forest products facilities. Ecology should review and revise after completion of current study. • Numbering scheme is complicated – should adopt EPA's system • All discharges covered by the municipal stormwater permits should be exempt from the industrial stormwater general permit | Only comments about modifications are considered during this public comment period. |
| Johnson 2 Schramm 6 | | Permit is complicated and should be simplified. Ecology should provide workshops and technical assistance. | Ecology is planning to do as many workshops and provide as much technical assistance as resources allow. Ecology is interested in partnering with industry and interest groups to put on workshops. |
| | | Ecology should provide guidance on possible zinc sources and BMPs to control zinc below the action level | Using existing resources, Ecology is working to identify possible zinc sources and possible BMPs to control zinc. As we develop information, it will be posted on our web site. |
| Kenefick 18.1 | S1.C.7 | Should reference S3.E not S3.D | Agree – changed in final document. |

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| Johnson 4 Steffensen 1, 2, 3 Rick Smith 3, 4 Noling 1 Mathias 2 Kenefick 1 Like 1.1, 1.2 | S3.C | The permit should use EPA's provisions for allowable non-stormwater discharges from their multi-sector permit. | Ecology used EPA's provisions as a starting point. However, Washington State laws also apply. Revisions were necessary to meet Washington State specific conditions. |
| | | <ul style="list-style-type: none"> Where chlorinated, water from fire protection system flushing, maintenance and testing should be dechlorinated prior to discharge. Ecology should eliminate requirement for de-chlorination | Ecology has required de-chlorination of water line flushing and other potable water discharges for many years. It has not been a difficult requirement to meet. The requirements to characterize and evaluate will drive de-chlorination where appropriate. |
| | | Only emergency fire-fighting activities should be exempt. Routine activities should not be exempt. | Routine fire-fighting preparedness is not exempt. Only actual fire-fighting is exempt. Fire-fighting by definition is an emergency activity. |
| | | <ul style="list-style-type: none"> Should include sampling of non-stormwater discharges Irrigation drainage water should be tested and/or treated for fertilizers and pesticides prior to discharge. | Requirement is to "adequately characterize." This may include sampling if necessary. If a discharge can be adequately characterized without sampling, Ecology does not see the need for the additional expense of sampling. |
| | | Does not meet AKART requirement because it requires source control measures only. It also should require Ecology review. | Ecology is defining AKART for these incidental sources as source control generally. Compliance with Water Quality standards may drive additional treatment. |
| | | Incidental windblown mist from cooling towers should not be included as a non-stormwater discharge. | Ecology concurs with EPA's multi-sector general permit that incidental windblown mist from cooling towers is generally a minor source. If a particular source is a concern, the requirements to characterize and assess the discharge will address it. |
| | | A SWPPP should not be required for potable water discharges when the requirements of the regional road maintenance plan are implemented. | The regional road maintenance plan has been added as an approved guidance document. If the appropriate source control is per the regional road maintenance plan or another approved guidance document, then the SWPPP can simply reference the document. However, it is important that all potential sources be documented in the SWPPP to show that permit holder is aware of the sources and is managing them appropriately. |

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| | | Delete “uncontaminated” from ground water or spring water discharges | This would not be appropriate. Adequate characterization can be done in most cases without sampling. If the groundwater comes from a known area of contamination such as a MTCA or CERCLA clean-up site, then additional controls are appropriate and should be included. No changes made to section S3.C. |
| Rick Smith 5,6 Steffensen 4 Johnson 5 C. Smith 1 Tupper 1 Ruby 1 | S3.E | Deletion of the numeric effluent limit for discharges to impaired waterbodies is backsliding. | The deletion of the numeric effluent is mandated by ESSB 6415. Ecology was not able to notify permit holders whether they were covered by a TMDL or not. Because of this, permit holders were not complying with the condition. Therefore, it is not illegal backsliding. |
| | | TMDLs that apply should be as of date of modification, not date of permit issuance. | This date was set by the settlement agreement of the original appeal. |
| | | <ul style="list-style-type: none"> • TMDLs and 303(d) listings should apply immediately when they are completed. • Requirements due to TMDLs and 303(d) listings should not go into effect until next permit term | Ecology cannot change the requirements of the permit without giving the permit holders and the public the ability to comment on the changes. Therefore, Ecology cannot legally put automatic changes into the permit based on new TMDLs and 303(d) listings without following the procedures for a major permit modification. Federal law requires the permit include requirements due to TMDLs and 303(d) listing when the permit is issued |
| | | Ecology should confirm that Appendices 4 and 5 are complete. | Ecology has made every effort to ensure that Appendices 4 and 5 are complete and accurate. We did not receive detailed discharge information from every permit holder. If anyone is aware of incorrect information in Appendices 4 and 5, please submit a written description of the error with supporting evidence. Ecology will correct errors in Appendix 4 and 5 as they are discovered and issue updated cover sheets for the affected permittees. |
| | | Numeric effluent limits should not be set for compliance with TMDLs – they should be changed | Numeric effluent limits are set for compliance with TMDLs only when the TMDL specifically identified stormwater as a source of |

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| | | to narrative requirements | the pollutants of concern and specifically set a waste load allocation, load allocation or control measures for stormwater. |
| | | List the point of compliance for numeric effluent limits | Unless a permittee applies for and receives a mixing zone, the point of compliance is the sampling point listed in their SWPPP. |
| Johnson 6 | S3.E.2 and 3 | Change “waters listed” to “the water segment listed” for clarity. | The term “waters listed” has been changed to “waterbody segments listed” throughout the permit. |
| Johnson 7, 8 | S3.E.2 | Effluent limits should not be applied when TMDLs did not set WLA unless the TMDL is formally revised and resubmitted to EPA | Previously, stormwater was given a load allocation as part of a non-point source in TMDLs. Only recently has EPA guidance changed to put stormwater into waste load allocations. It would take a significant amount of resources for Ecology and EPA to revise all the previous TMDLs to change load allocation to waste load allocation. None of the underlying information or results would change. This would not be a prudent use of taxpayer resources. Ecology has developed effluent limits only where stormwater was clearly identified as a significant source. |
| | | Appendix 5 footnote + is confusing | Appendix 5 footnote + has been changed to read “Parameter covered by a TMDL. Compliance with the permit constitutes compliance with the TMDL. Monitoring and benchmarks in the permit still apply.” |
| | | Specific information provided on Weyerhaeuser facilities on appendix 4 and 5 | Appendixes 4 & 5 have been updated. See attached specific response to these comments |
| Kenefick 16 | S3.E.3 | ESSB 6415 does not impose affirmative obligations on permittees – only on Ecology. Revise language to clarify | Language has been revised to show permit holders requirements rather than the reasons for it. |
| Steffensen 5 Johnson 9 | S3.F | <ul style="list-style-type: none"> Ecology should ensure previously authorized mixing zones still apply Ecology should only authorize mixing zones after a site inspection. | The PCHB ruled in the appeal that the procedure in the originally issued permit for granting “standard mixing zones” was not legal and any “standard mixing zones” granted under that process were not legal. Therefore, Ecology cannot continue to apply previously authorized mixing zones. The mixing zone process in the modified permit is rigorous. Ecology has the ability to inspect sites as needed under condition G.3. An |

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| | | | additional requirement for an inspection would add complication but no additional authority to Ecology. No changes made. |
| C. Smith 2 Ruby 2 Schramm 1 | S4 | <ul style="list-style-type: none"> Do not revise the sampling requirements – keep what’s in the current permit The proposed sampling requirements are an improvement – please adopt them. | No changes made as a result of these comments The sampling requirements have been revised somewhat as a result of other comments, but they are basically what was sent to public comment. |
| Rick Smith 7, 8, 9 Joerger 1 Ruby 3 | S4 | <ul style="list-style-type: none"> The permit doesn’t include a condition requiring sampling of first fall storm per PCHB ruling. The permit doesn’t require receiving water sampling for a mixing zone per PCHB ruling. The permit doesn’t lower the benchmark for copper per the PCHB ruling. | The PCHB ruling on monitoring was appealed by all parties. The ruling was subsequently rendered moot by the passage of ESSB 6415. Thus, the permit modifications were made in accordance with ESSB 6415 rather than the PCHB ruling. (Note: not all of the PCHB rulings were rendered moot. See the fact sheet on the modification for more information.) |
| | | Permit should require monthly sampling rather than quarterly | Due to the difficulty in getting stormwater samples, the sampling requirements have been left at quarterly. |
| Rick Smith 10 Joerger 2 Ruby 4, 5, 6 Dierker 1 Thomson 1 Kenefick 2, 18.2 | S4.A | <ul style="list-style-type: none"> Clarify S4A3 sentence beginning “In the alternative, the storm event should have an intensity...” Change “should” in subparagraphs 1, 3, and 4 to “must.” Remove any reference to sampling storm events of less than 0.1 inches in magnitude. Follow EPA’s sampling direction in the multi-sector permit The permit conflicts with Ecology guidance documents. If the permit is modified, these documents must be updated. Reduction of monitoring requirements should not be made. Supports proposed changes. | Based on the comments, the criteria for monitoring have been revised to clarify the criteria and to clarify the permittee’s responsibilities when the criteria are not met. Typographical errors were corrected. Ecology will update guidance documents to be consistent with this permit as resources allow. |

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| | | <ul style="list-style-type: none"> • Typographic errors 0/1 to 0.1 – move “preceding sample collection for clarity. | |
| Thomson 2 Kenefick | S4.B.1 | <ul style="list-style-type: none"> • Suggest remove “unstaffed” from the description of inactive sites to allow sites with security personnel to qualify for the waiver • Clarify inactive and unstaffed | A definition of “unstaffed” has been added to address these concerns. |
| Rick Smith 11, 12, 13, 14, 15, 16 Johnson 10 Wishart 1 SArmentrout 1, 2 C. Smith 3 Joerger 3, 4, 5, 6 Noling 2, 3, 4, 5, 6 Tupper 2, 5, 8, 9, 10 Ruby 7, 8, 9, 10, 11 Thomson 3, 4, 5 Kenefick 4, 5, 6, 7, 8, 9, 10, 18.3 Schramm 2, 3, 4 Like 2, 3, 4 | S4.C | The references to both “benchmark values” and “action levels” are potentially confusing. | Ecology has attempted to clarify the difference between benchmark values and action levels. Both benchmarks and action levels are necessary to implement an adaptive management strategy as required by ESSB 6415. |
| | | Action levels should be rounded to 3 significant figures. | Ecology agrees and has made the change. |
| | | Averaging of monitoring results should not be allowed. Action should be based on the highest sample result. | Stormwater sampling is difficult at best. Stormwater changes rapidly. Averaging is allowed to assist in reducing the uncertainty of sample results. Permit holders must report both average and maximum values to Ecology. Ecology will review the data during the remainder of the permit term to see if allowing averaging causes a significant difference. |
| | | <ul style="list-style-type: none"> • Two weeks is too long for an inspection after getting a high sample result • Two weeks is too soon to require an inspection. | Based on the conflicting comments received, Ecology has left the requirement for an inspection at two weeks. |
| | | <ul style="list-style-type: none"> • Action levels are too lenient, particularly metals and pH. • Action level for zinc is too low – should be set consistent with background levels. • Action levels should be based on Washington State data gathered during this permit term and set next permit term. | Action levels are set based on available information. How the levels were derived is described in the addendum to the fact sheet. More information will be gathered during this permit term, so the action levels may be adjusted when the permit is reissued. |

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| | | <ul style="list-style-type: none"> Relax the number of exceedances needed to trigger Level 2 or 3 responses, possibly by incorporating background levels into the equation. Level 2 and 3 should not be included in this permit – the soonest they should be included is the next permit term. If Levels 2 and 3 are included, at least 5 years of data should be required. | ESSB 6415 requires an adaptive management strategy in this permit modification. Level two and three responses are designed to meet this requirement. They are designed to provide the maximum flexibility while maintaining the requirement for enforceable actions on a specified timeframe. Ecology is retaining the Level 2 and 3 response in this permit modification. As described below, the conditions have been modified for clarity. |
| | | Change “Nitrate/Nitrite” to “Nitrate/Nitrite Nitrogen” and “Phosphorus” to “Total Phosphorus.” | Ecology agrees. Permit has been changed. |
| | | <ul style="list-style-type: none"> The timeframe for obtaining a waiver is very short. Can Ecology support this? Specific language should be added to levels one and two to allow for a waiver application. | Ecology will endeavor to meet the timeframes implied by the permit. If a huge number of waivers are requested, Ecology may not be able to meet the timeframes. Ecology has not added a waiver option to Levels 1 and 2 due to concerns about our ability to meet the demand. |
| | | Replace “promptly” in Level 2 and 3 with a specific time frame. | The required timeframe for reporting is an enforceable timeframe. Ecology does not believe that adding an additional interim date will significantly improve compliance. It would significantly reduce the flexibility a business has to respond. Ecology has not changed this language. |
| | | <ul style="list-style-type: none"> Clarify how failures to collect samples are considered in criteria. Insert “any” before “four quarterly samples” or clarify whether this applies to any four samples or four consecutive samples. | Ecology has revised the language to make it clear that it is any four samples. This indicates that it is only samples collected. A repeated failure to collect samples when appropriate weather conditions exist will result in an investigation by Ecology. |
| | | <ul style="list-style-type: none"> Revise “investigate all available options of source control” to read “investigate appropriate and applicable BMP options for source control, operational control and stormwater treatment as identified in the most recent version of the | This permit requirement is to ensure compliance with water quality standards, not AKART. Therefore, it is necessary for the permittees to investigate all available options. The Federal Clean Water Act and State Water Pollution Control Act do not allow consideration of cost effectiveness in meeting |

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| | | <p>Western (or Eastern) Washington Stormwater Management Manual.”</p> <ul style="list-style-type: none"> • Level 2 response should allow for more flexibility and consideration of reasonableness and cost effectiveness. • Level 2 response should be better defined. • Delete the Level 3 response. • If Level 3 response is retained, allow greater flexibility. | <p>water quality standards. Ecology has included as much flexibility as possible in the process, while still requiring compliance with water quality standards.</p> |
| | | <p>Issuing waivers through administrative orders is an illegal permit modification and opens up possibility of a third party lawsuit.</p> | <p>The option of issuing waivers through administrative orders has been removed from the permit.</p> |
| | | <p>Set action levels for 303(d) benchmarks or clarify that only level 1 response is required.</p> | <p>As the commenter points out, some permit holders discharging to a 303(d) listed waterbody have benchmarks for parameters not shown in this list. For these parameters, the action levels have been set at twice the benchmark.</p> |
| | | <p>Clarify that if sampling results are consistently above benchmarks, but below action levels, the facility may use previous results rather than repeating actions.</p> | <p>Ecology believes that an inspection should be made each time sample results exceed benchmarks. There may be a new source or a change in operations. If no change is found, the reporting will be simple. No change has been made to the permit.</p> |
| | | <ul style="list-style-type: none"> • Insert “taken, if any” after remedial action if investigation shows no remedial action is needed. • Clarify Level 1 response to say what happens if the source is not identified or no reasonable source control action exists. • Level 1 response is too stringent and required reports will overwhelm Ecology. • Insert “potential” and “from industrial activities” to show that the definite cause may never be known and that the source may be outside of | <p>Level 1 response has been revised to clarify that no remedial action may be appropriate. The required reports are included with quarterly reports that Ecology must process anyway, so the increased workload should not overwhelm Ecology. These reports are intended to be very short reports on the comments section of the DMR – not more than a paragraph in length.</p> |

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| | | the permit holder's control. | |
| | | Change "implement additional source control, ..." to "Initiate the implementation of..." to acknowledge some BMPs may take a long time to implement. | The current language calls for reporting "actions taken, planned and scheduled." This clearly shows that implementation may take time. No change has been made to the language. |
| | | Clarify that the existence of an action level for a parameter does not imply that sampling is required (e.g. BOD). | The language has been revised to clarify which samples it applies to. Sampling is only required as described in Condition S4.D. |
| | | <ul style="list-style-type: none"> Clarify that trigger for level 2 or 3 response is only for exceedances of the same parameter. Clarify that Level 2 response is only triggered once. | Language has been clarified. |
| | | <ul style="list-style-type: none"> Put S.4.D before S.4.C. Correct typo "of inititating the a level three" "Contaminate" should not be used as an adjective – should be "contaminant." | Typos have been corrected. |
| Rick Smith 18 Graves 1, 2 Kenefick 11, 12 Like 6.1, 6.2 | S4.D.1 | <ul style="list-style-type: none"> This brings the permit into compliance with federal regulations. Clarify that any changes apply after the effective date of the modification. Clarify that consultants hired to do inspections should not do certifications, but the certifications should be done by the permit holder. Certifications should not be required for visual monitoring reports. Visual monitoring reports should not be made part of the SWPPP. Clarify how the Department will address a report saying that BMPs must be implemented, when stormwater testing results are below | <p>This section has been revised to clarify the certification requirements and to clarify that the duly authorized representative should do certifications.</p> <p>Ecology does not agree that visual monitoring reports should not be attached to the SWPPP. Visual monitoring reports are key in keeping the SWPPP updated and accurate. The SWPPP is the requirement to meet technology-based requirements. Technology-based requirements apply regardless of whether a water-quality based violation is occurring. Technology-based requirements must be implemented if they are reasonable – which includes a cost test. Therefore, if a visual monitoring report says BMPs must be implemented, and they are reasonably achievable, Ecology will expect them to be implemented within a reasonable period of time. Compliance with water quality standards is required regardless of cost.</p> |

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| | | benchmarks. | |
| Rick Smith 19 | S4.E | Modification of sampling requirements should only be through permit modification and not through order. | Agreed. The permit language has been changed. |
| Johnson 11 Tupper 3, 4 Thomson 7 Kenefick 3, 17 Like 5.1 | S4.G and G.3 | <ul style="list-style-type: none"> Retain quarterly monitoring rather than monthly monitoring. Clarify what parameters are subject to additional monitoring requirements. Benchmarks are set with an arbitrary Margin of Safety. | Given the difficulty in collecting stormwater samples, all monitoring requirements have been changed to quarterly. The language has been clarified to show which parameters are subject to additional monitoring requirements. Benchmarks are set with the best available information. As the monitoring required in this permit is completed, additional information will be received. Benchmarks and associated action levels may be revised based on new information when the permit is reissued. |
| Rick Smith 20 Tupper 7 Thomson 9, 10 | S4.G | <ul style="list-style-type: none"> Replace the words “effluent limitation” with “benchmark” for 303(d) monitoring. Allow suspension of monitoring if permit holder can otherwise demonstrate to Ecology that there is no reasonable potential to violate water quality standards. | Effluent limitation has been replaced with benchmark to be consistent with the change in the permit. If the permittee wants to show that there is no reasonable potential to violate water quality standards without eight quarterly samples, they need to apply for an individual permit. Such a demonstration is outside the scope of a general permit. |
| Rick Smith 21, 22, 23 Thomson 8 | S4.G.1.a S4.G.1.b S4.G.2 | References should be to monthly not quarterly samples. | Samples have been changed to quarterly per comments above. No change needed to the permit. |
| Rick Smith 20, 24 | S4.G & H | Changing the start date for additional monitoring for discharges to impaired waterbodies is impermissible backsliding. | Ecology was not able to notify permit holders whether they were discharging to an impaired waterbody or not. Because of this, permit holders were not complying with the condition. Therefore, it is not illegal backsliding. |
| Rick Smith 25 | S5.A | The last paragraph should reference results above action levels as well as above benchmarks. | Agreed. Language has been added. |
| Johnson 12 C. Smith 4 Tupper 6 Ruby 12 | S5.F | <ul style="list-style-type: none"> The permittee should not be supplying SWPPPs to the public. All requests should go through Ecology. Replace this section of the permit with EPA’s | The permittee must let members of the public who request the SWPPP in writing know where and when they can view the SWPPP. This can be at Ecology or another location such as a library. There is no requirement that the public be allowed to |

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| Kenefick 13 Schramm 5 Like 7 | | <p>provisions in the multi-sector general permit.</p> <ul style="list-style-type: none"> Do not change the language in the permit. | visit the facility to review the SWPPP. |
| Rick Smith 26, Wishart 2 | S5.F.3 | <ul style="list-style-type: none"> The condition should make it a permit violation to advance a baseless claim of confidential business information or security. Determination of confidential business information or security should be made by a third party, possibly Ecology, and subject to review. | Determination of confidential business information is by Ecology. The permit requires the permittee to provide the entire SWPPP to Ecology. In cases of public request, Ecology works with permittee and the requester and provides the information deemed appropriate. If Ecology does not concur with a confidential business information claim, Ecology is required to release the information under public disclosure laws. |
| Johnson 13 Like 8.2 | S7 | <p>Insert into S7: “A demonstration of water quality standards attainment at the point of compliance will alleviate the requirement of a permittee to satisfy S4.C. <i>Response to Monitoring Results Above Permit Benchmark Values.</i> An evaluation of water quality standards attainment will be based on information developed from implementation of a receiving water study plan approved by Ecology.”</p> | This would be modification of the permit. This is beyond the scope of a general permit. If a permit holder wants to use this approach, they should apply for an individual permit. This demonstration could be a consideration in determining whether treatment waiver is appropriate under the level 3 response. |
| Johnson 14 Noling 7, 8, 9, 11 Like 8.1, 8.3 Kenefick 14 | S7.E.2, S9 | <ul style="list-style-type: none"> Soften the substantive requirements for the “demonstrably equivalent” review. Eliminate references to Ecology’s stormwater manual. | Ecology’s stormwater manual is a tool to assist in determining appropriate stormwater best management practices. It would be inappropriate to remove the references. It would also be inappropriate to treat the manual as a rule since it is only guidance. Therefore, the demonstrably equivalent requirements are necessary. |
| Rick Smith 27 Like 9 | S9 | <ul style="list-style-type: none"> Remove the sentence “unless there is site-specific information to indicate otherwise, permittees which choose the presumptive approach are presumed to be in compliance with standards as set forth in S7.” This may seem to conflict S7 which has appropriate | The proposed modifications to S9 are the result of a settlement agreement and are necessary to ensure the stormwater manuals are correctly used as guidance documents and not rules. The proposed modification was adapted to remove the perceived conflict with S7. |

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| | | language. <ul style="list-style-type: none">• Delete the proposed modifications to S9. | |
| Rick Smith 28 Noling 10 | S9.B.3 | The word “include” is missing from the first line. | Agreed. It has been added. |

LIST OF COMMENTERS:

| From | Representing | Mailing address | City | State | Zip |
|--|---------------------------------------|--|--------------|-------|------------|
| Timothy P Ruby, | Del Monte Corp | 205 N Wiget Lane | Walnut Creek | CA | 94598 |
| Jerry Dierker Jr | Self | 1720 Bigelow St NE | Olympia | WA | 98506 |
| Nathan Graves | Kennedy/Jenks Consultants | 32001 32nd Ave S, Suite 100 | Federal Way | WA | 98001 |
| Craig Smith | Northwest Food Processors Association | 9700 SW Capitol Highway, Suite 250 | Portland | OR | 97219 |
| Dan Mathias | Everett Public Works | 3200 Cedar St | Everett | WA | 98201 |
| Richard Smith | Smith & Lowney PLLC | 2317 E John St | Seattle | WA | 98112 |
| Andrew Kenefick | Waste Management | 801 Second Ave, Suite 614 | Seattle | WA | 98104 |
| Kirk Thomson/Susanne McIlveen | Boeing | susanne.r.mcilveen@boeing.com | | | |
| Ken Johnson | Weyerhaeuser | PO Box 9777 | Federal Way | WA | 98063-9777 |
| Wendy Steffensen | North Sound Baykeeper - Resources | 1155 N State St #623 | Bellingham | WA | 98225 |
| SArmentrout@unimin.com | | SArmentrout@unimin.com | | | |
| Sue Joerger | Puget Soundkeeper Alliance | 4401 Leary Way NW | Seattle | WA | 98107 |
| David Like | Hampton Lumber Mills | PO Box 8 | Willamina | OR | 97396 |
| Judy Schramm | Wafer Tech | 5509 NW Parker St | Camas | WA | 98607-9299 |
| James A Tupper, Jr | Mentor Law Group | 1100 Market Place Tower 2025 1st Ave | Seattle | WA | 98121 |
| Bruce Wishart | People for Puget Sound | 911 Western Ave, Suite 580 | Seattle | WA | 98104 |
| Calvin P Noling | Stormwater Management, Inc | 12021-B NE Airport Way | Portland | OR | 97220 |